

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

ARKANSAS CABLE)

TELECOMMUNICATIONS)

ASSOCIATION; COMCAST OF)

ARKANSAS, INC.; BUFORD)

COMMUNICATIONS I, L.P. d/b/a)

ALLIANCE COMMUNICATIONS)

NETWORK; WEHCO VIDEO, INC.;)

COXCOM, INC.; and CEBRIDGE)

ACQUISITION, L.P., d/b/a SUDDENLINK)

COMMUNICATIONS,)

Complainants,)

v.)

ENTERGY ARKANSAS, INC.,)

Respondent.)

EB Docket No. 06-53

EB-05-MD-004

COMPLAINANT ACTA'S SIXTH AMENDED RESPONSES
TO ENTERGY'S FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION

Complainant Arkansas Cable Telecommunications Association

("ACTA" or "Complainant") hereby responds to Entergy's First Interrogatories and

Requests for Production as follows:

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Statement

This responding party and its attorneys have not completed discovery in this action. All of the responses contained herein are based solely upon information presently available to and specifically known by the party and its attorneys after diligent and good faith investigation. As discovery continues, witnesses, facts, and evidence may be discovered which are not set forth herein, but which may have been responsive to one or more of the interrogatories had the information been known at this time.

Facts and evidence now known may be imperfectly understood, and the relevance or consequences of such facts and information may be imperfectly understood. Accordingly, some facts and evidence now known may not, in good faith, be included in the following responses.

Complainant anticipates that further discovery, independent investigation, legal research and analysis will supply additional facts, may supply new meaning to known facts, and may establish entirely new facts or conclusions and legal contentions, all of which may lead to substantial modification to the discovery responses herein. The following interrogatory responses are given without prejudice to Complainant's right to produce witnesses and evidence, the significance of which are only subsequently discovered. Complainant therefore reserves the right to modify any or all responses made herein as additional facts are obtained, analyses are made, legal research is completed and contentions are developed. The responses contained herein are made in a good faith effort to supply

such factual information as is presently known, but should in no way be interpreted to prejudice the rights of Complainant in relation to future discovery, research, or analysis.

Finally, Entergy's requests are in some cases duplicative of each other, and each document identified may not be responsive only to the Interrogatory or Request marked; in many cases, documents may be responsive to one or more additional Interrogatory or Request.

GENERAL OBJECTIONS

Complainant asserts the following General Objections, which are incorporated by reference into each specific response below:

1. Complainant objects to the Interrogatories, including the "Instructions" and "Definitions," to the extent that they seek to impose burdens or duties upon Complainant that exceed the requirements and permissible scope of discovery under the FCC's Rules and Procedures governing hearings and the Orders, including but not limited to the Hearing Designation Order and Judge Steinberg's April 20, 2005 Procedural Order.

2. Complainant objects to the Interrogatories to the extent that they seek information reflecting communication protected from disclosure by the attorney-client privilege and/or material protected by the work-product doctrine or any other applicable privilege.

3. Complainant objects to the Interrogatories to the extent that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

4. Complainant objects to the Interrogatories to the extent that they seek proprietary and/or confidential information and/or trade secrets.

5. Complainant objects to the Interrogatories to the extent that they are vague, overly broad, and/or confusing.

6. Complainant objects to the Interrogatories to the extent that they are unduly burdensome, unreasonably cumulative and duplicative, or call for information already in Entergy's (or its agents', representatives' and contractors') possession.

7. Complainant objects to the Interrogatories to the extent that they are intended solely for the purpose of annoyance, embarrassment, harassment, and/or oppression.

8. Complainant objects to the Interrogatories to the extent that they seek information that should more properly be obtained through deposition testimony.

9. Complainant anticipates discovering additional information and materials during the discovery process, which may be responsive to the discovery

requests. Complainant expressly reserves the right to rely on such information and materials if and when they are discovered after the date of this response.

10. Complainant expressly reserves the right to supplement these objections.

11. These General Objections are incorporated into each specific response below and all such responses shall be subject to the foregoing General Objections.

INTERROGATORY NO. 1: Identify the individuals who participated in responding to these interrogatories and requests for production and list the corresponding interrogatory or request for production for which they participated.

RESPONSE: See response to Interrogatory No. 1 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 2: Identify each individual you will or may call to testify as a fact witness at the formal hearing of this proceeding before the Administrative Law Judge or who will or may provide written testimony and state the subject matter on which each such witness will or may testify.

RESPONSE: See objections and response to Interrogatory No. 2 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 3: Identify to the best of your ability at this time each individual you will actually call to testify as a witness at the formal hearing of this proceeding before the Administrative Law Judge or who will actually provide written testimony so that their depositions can be timely noticed and completed by EAI in compliance with the Administrative Law Judge's order issued April 20, 2006, FCC 06M-09.

RESPONSE: See objections and response to Interrogatory No. 3 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 4: Identify each individual you will or may call to testify as an expert witness at the formal hearing of this proceeding before the Administrative Law Judge or will or may provide written testimony.

RESPONSE: See response to Interrogatory No. 4 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 5: Identify all individuals who have knowledge, information or documents relating to the issues to be addressed at the formal hearing before the Administrative Law Judge which are contained in the Hearing Designation Order adopted on March 1, 2006, DA 06-494.

RESPONSE: See objections and response to Interrogatory No. 5 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 6: Identify all individuals who were not identified in response to Interrogatory No. 5 who have knowledge, information or documents relating to facts, allegations, contentions or subject matter described in the pleadings in FCC Docket Nos.: EB-05-MD-004, EB 06-53.

RESPONSE: See objections and response to Interrogatory No. 6 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 7: Identify and describe every communication between you and any of your agents, contractors, subcontractors, employees, Complainants, members, other cable operators, other telecommunications operators, other telecommunications carriers, or any other entity relating to Utility Support Systems, Inc. ("USS"), safety inspections performed by USS, or safety violations reported by EAI or USS to any of the Complainants or their agents or contractors or subcontractors.

RESPONSE: See objections and response to Interrogatory No. 7 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO.8: Identify and describe every communication, not otherwise identified in response to Interrogatory No. 7, between you and any of your agents, contractors, subcontractors, employees, Complainants, members, other cable operators, other telecommunications carriers, or any other entity relating to any fact, allegation, contention, or subject matter described in the pleadings in FCC Docket Nos.: EB-05-MD-004, EB 06-53.

RESPONSE: See objections and response to Interrogatory No. 9 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

REQUEST FOR PRODUCTION NO. 1: Produce all documents and tangible objects of every kind that you intend to introduce into evidence or otherwise rely on at the formal hearing of this proceeding before the Administrative Law Judge.

RESPONSE: See objections and response to Request No. 1 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

REQUEST FOR PRODUCTION NO. 2: Produce all documents and tangible objects of every kind in your possession or under your control relating to the issues to be addressed at the formal hearing before the Administrative Law Judge which are contained in the Hearing Designation Order adopted on March 1, 2006, DA 06-494.

RESPONSE: See objections and response to Request No. 2 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

REQUEST FOR PRODUCTION NO. 3: Produce all documents relating to every communication identified in your responses to Interrogatory Nos. 7 and 8.

RESPONSE: See objections and response to Request No. 3 of Complainants' Sixth Amended Responses to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

ARKANSAS CABLE
TELECOMMUNICATIONS ASSOCIATION;
COMCAST OF ARKANSAS, INC.; BUFORD
COMMUNICATIONS I, L.P. D/B/A
ALLIANCE COMMUNICATIONS NETWORK;
WEHCO VIDEO, INC.; COXCOM, INC.;
AND CEBRIDGE ACQUISITION, L.P., D/B/A
SUDDENLINK COMMUNICATIONS



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October 6, 2006

Its Attorneys

CERTIFICATE OF SERVICE

I, Christine Reilly, hereby certify that on October 6, 2006, a copy of the foregoing COMPLAINANT ACTA's SIXTH AMENDED RESPONSES TO ENTERGY'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION were hand-delivered, and/or placed in the United States mail, and/or sent via electronic mail, postage prepaid, to:

Marlene H. Dortch (*Orig. & 3 copies*)

Secretary

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445 12th Street, S.W.

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The Honorable Arthur I. Steinberg **

Administrative Law Judge

Office of the Administrative Law Judge

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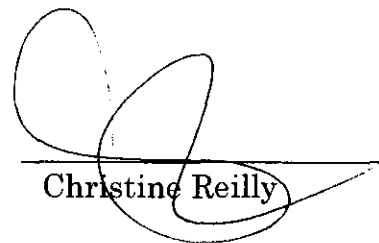
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Christine Reilly

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